

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; ELIZA
SAUNDERS, Director of the Office of
Public Records, in her personal and official
capacity; ALISON SWENSON, Compliance
Analyst, in her personal capacity; PERRY
TAPPER, Public Records Compliance
Officer, in his personal capacity; ANDREW
PALMER, Compliance Analyst, in his
personal capacity; JOHN or JANES DOES
1-12, in his or her personal capacity,
Defendants.

No. 2:17-cv-00642-MJP

STIPULATION TO ALLOW
DEFENDANTS TO AMEND ANSWER
TO ADD DEFENSE

In accordance with FRCP 15(a) and WDLCR 15, Plaintiff, by and through her
counsel of record and Defendants, by and through their counsel of record, hereby stipulate
and agree that Defendants may file a First Amended Answer, Affirmative Defenses, and
Cross-Claim (attached with proposed amendments as Exhibit 1.) This stipulation will be
filed with the Court as evidence of said agreement.

///

///

///

///

STIPULATION TO ALLOW DEFENDANTS TO AMEND
ANSWER TO ADD DEFENSE - 1
2:17-cv-00642-MJP

KEATING, BUCKLIN & MCCORMACK, INC., P.S.

ATTORNEYS AT LAW
801 SECOND AVENUE, SUITE 1210
SEATTLE, WASHINGTON 98104-1518
PHONE: (206) 623-8861
FAX: (206) 223-9423

1
2 DATED: July 23, 2018

3 KEATING, BUCKLIN & McCORMACK, INC., P.S.

4
5 By: /s/ Jayne L. Freeman

6 Jayne L. Freeman, WSBA #24318

7 Special Assistant Attorney General for Defendant

8 801 Second Avenue, Suite 1210

9 Seattle, WA 98104-1518

10 Phone: (206) 623-8861

11 Fax: (206) 223-9423

12 Email: jfreeman@kbmlawyers.com

13 By: _____

14 Joseph Thomas, WSBA #49532

15 Attorney for Plaintiff

16 14625 SE 176th St Apt N101

17 Renton, WA 98058-8994

18 Telephone: (206) 390-8848

19 Email: joe@joethomas.org

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff

Mr. Joseph Thomas
14625 SE 176th Street, Apt. N-101
Renton, WA 98058-8994
Telephone: (206) 390-8848
Email: joe@joethomas.org

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

[Insert non-CM/ECF mailing addresses here or type "N/A"]

DATED: July 23, 2018

/s/ Jayne L. Freeman

Jayne L. Freeman, WSBA #24318
Special Assistant Attorney General for
Defendant
801 Second Avenue, Suite 1210
Seattle, WA 98104-1518
Phone: (206) 623-8861
Fax: (206) 223-9423
Email: jfreeman@kbmlawyers.com